

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re

Chapter 7

ROBERT BRADFORD GRUNO,

Case No. 24-11727-lgb

Debtor.

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**EX PARTE APPLICATION BY CREDITOR UNITED JOINT VENTURE, L.P.  
PURSUANT TO RULE 2004 OF THE FEDERAL RULES OF BANKRUPTCY  
PROCEDURE FOR DOCUMENT PRODUCTION AND EXAMINATION**

TO THE HONORABLE LISA G. BECKERMAN  
UNITED STATES BANKRUPTCY JUDGE:

The application of creditor, UNITED JOINT VENTURE, L.P., (“United”), by its counsel, Vlock & Associates, P.C., respectfully represents:

1. On October 3, 2024, the Debtor filed a voluntary petition for relief under chapter 7, title 11 of the United States Code (the “Bankruptcy Code”) in this Court.
2. Kenneth Silverman has been appointed as the Chapter 7 Trustee in this case.
3. On October 3, 2024, the deadline to oppose the discharge of the Debtor or to challenge dischargeability of certain debts was set for January 6, 2025.
4. United is a creditor of the Debtor.
5. On November 5, 2024, the Debtor appeared for a 341 Meeting, which was incomplete and adjourned to December 3, 2024.
6. On or about November 19, 2024, United filed a Proof of Claim in the amount of \$437,163.11.

7. On November 26, 2024, the Debtor filed an Amended Statement of Financial Affairs.

8. On December 3, 2024, the continued 341 Meeting was adjourned to January 7, 2025.

9. Bankruptcy Rule 2004(a) states that: “On motion of any party in interest the Court may order the examination of any person.” The scope of examinations under Rule 2004(b) may include, among other things, any matter that may relate to the property and assets of the estate, the financial condition of the debtor, any matter that may affect the debtor’s right to a discharge, and any matter which may affect the administration of the estate.

10. The scope of examinations under Bankruptcy Rule 2004 is very broad, and is commonly recognized as more in the nature of a “fishing expedition.” *In re Corso*, 328 B.R. 375, 383 (E.D.N.Y. 2005); *In re Hughes*, 281 B.R. 224, 226 (S.D.N.Y. 2002); *In re Balakis*, 199 B.R. 443, 447 (E.D.N.Y. 1996).

11. The purpose of a Rule 2004 examination is to assist the investigator in revealing the nature and extent of the estate and to discover assets of the debtor that may have been intentionally or unintentionally concealed. *In re Bennet Funding Group, Inc.*, 203 B.R. 24, 27-28 (N.D.N.Y. 1996).

12. “Rule 2004 has been termed the basic discovery device used in bankruptcy cases, permitting the examination of any party without the requirement of a pending adversary proceeding or contested matter....Its obvious purposes are the discovery of assets of the estate and the exposure of fraudulent conduct.” *In re Symington*, 209 B.R. 678, 683-84 (Bankr. D. Md. 1997).

13. The examination of the Debtor is necessary in order to discover assets belonging to the Debtor's estate, and whether the petition is true and accurate. A list of the documents to be produced by the Debtor is annexed hereto as Exhibit "A."

14. No party's rights will be prejudiced in any way by the Court's granting of this application. It is also respectfully requested that the Court waive the submission of a memorandum of law as part of this application, as the issues involved herein are neither novel nor complex.

15. This application is being made ex parte pursuant to Judge Beckerman's individual rules.

WHEREFORE, it is respectfully requested that this Court grant the instant application in its entirety, together with such other and further relief as the Court deems just and proper under the circumstances.

Dated: New York, New York  
January 3, 2025

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